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11 Mr. Hooton

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-105-TLN  
16 Plaintiff, )  
17 vs. ) **STIPULATION AND ORDER TO CONTINUE**  
18 BRENT EDWARD HOOTON, ) **STATUS CONFERENCE AND EXCLUDE TIME**  
19 Defendant. )  
20 \_\_\_\_\_ )  
21 ) Date: August 5, 2021  
22 ) Time: 9:30 a.m.  
23 ) Judge: Hon. Troy L. Nunley  
24 )  
25 )

26 IT IS HEREBY STIPULATED and agreed by and between Acting United States  
27 Attorney Phillip A. Talbert, through Assistant United States Attorney Mira Chernick, counsel for  
28 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan  
Baigmoammadi, counsel for Defendant Brent Edward Hooton, that the status hearing currently  
set for August 5, 2021 at 9:30 be continued to October 7, 2021 at 9:30 a.m.

29 The parties specifically stipulate as follows:

30 1. By previous order, this matter was set for a status on August 5, 2021 at 9:30 a.m.  
31 2. Mr. Hooton now moves to continue the status conference to October 7, 2021 at 9:30 a.m.  
32 3. The government has discovered the complaint affidavit, made electronic evidence  
33 available for defense review, and represented that non-contraband discovery will be  
34 produced within the next week.  
35 4. The defense requires time to review the discovery; investigate and research possible

defenses; research potential pretrial motions; consult with Mr. Hooton; explore potential resolutions to the case; and otherwise prepare for trial.

5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See U.S.C. § 3161(h)(7)(B)(iv).*
6. The government does not object to the continuance.
7. The parties jointly request the Court to find that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Hooton in a speedy trial; and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), that the time period between August 5, 2021 and October 7, 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: August 2, 2021

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Hooton

Date: August 2, 2021

PHILLIP A. TALBERT  
United States Attorney

/s/ Mira Chernick  
Mira Chernick  
Assistant United States Attorney  
Attorneys for Plaintiff

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: August 2, 2021

  
Troy L. Nunley  
United States District Judge